

U.S. Department of Justice

*United States Attorney
Southern District of New York*

**USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED JUN 14 2013**

*86 Chambers Street, 3rd floor
New York, New York 10007*

June 11, 2013

BY HAND DELIVERY

The Honorable Katherine B. Forrest
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *McKannev v. Dep't of the Navy*,
No. 13 Civ. 1535 (KBF)

Dear Judge Forrest:

This Office represents the defendant, Department of the Navy ("Navy"), in this Freedom of Information Act ("FOIA") matter. I write to request a two-week extension of the Government's time to file its motion for summary judgment (the "motion"), because the press of business has prevented the Government from completing the necessary motion papers under the current schedule.

Currently, the Government's motion is due June 17, 2013. The undersigned made a two-day deposition trip to North Carolina two weeks ago, served two days on state court jury duty last week, and will be in South Carolina on government business for the remainder of this week. Accordingly, the Government respectfully requests that the Court grant it until July 1, 2013 to file its motion. If granted, the current schedule would be amended as follows:

- July 1, 2013: Government's Motion
- July 31, 2013: Plaintiff's Opposition
- August 14, 2013: Government's Reply, if any

This is the Government's first request for an extension. Counsel for the Government contacted the *pro se* Plaintiff via email to determine whether Plaintiff will consent to the requested extension, but has not received a reply.

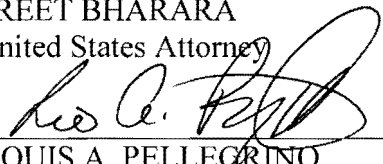
Thank you for your consideration of this matter.

Hon. Katherine B. Forrest
June 11, 2013
Page 2

Respectfully,

PREET BHARARA
United States Attorney

By:



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cc: Mr. Silvester McKanney, *via email and U.S. Mail*
2266 Andrews Ave.
Apt. 1-D
Bronx, NY 10468

Ordered
Extensions granted
as set forth herein.

6/14/13

K B. For
USDJ

Copy to: Silvester McKanney
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